

## **REMARKS**

In the Office Action, the Examiner rejected claims 4 and 9-15 under 35 USC § 102(e), and rejected claims 1-3 and 5-8 under 35 USC § 103(a). These rejections are fully traversed below.

Claims 1, 4, 5 and 9 have been amended to further clarify the subject matter regarded as the invention. New claims 16-18 have been added to the application.

Claims 1-18 are pending. Reconsideration of the application is respectfully requested based on the following remarks.

## **PRIORITY**

In the Office Action, the Examiner commented on the priority being claimed. It appears that the Examiner made an error noting the effective filing date of the present application. Nevertheless, the patentability of the claimed invention over the cited references is clearly established below.

## **REJECTION OF CLAIMS 4 AND 9-15 UNDER 35 USC § 102(e)**

In the Office Action, the Examiner rejected claims 4 and 9-15 under 35 USC 102(e) has been anticipated by Schleimer et al. This rejection is fully traversed below.

Schleimer et al. describes the network browsing system that includes a host computer coupled to a client computer by a network. "A server process implemented on the host computer services the request for desired data received from the client computer by modifying the desired data into modified data such that no additional connection between the client computer and the host computer is required to receive the entirety of the modified data." Hence, Schleimer et al. attempts to provide efficient data transfer by not requiring additional connections to receive other embedded components.

On pages 3 and 4 of the Office Action, with respect to Schleimer et al. the Examiner points to column 11, lines 14-20; and column 6, lines 32-27, column 4, lines 26-37; and Figure 9 as being pertinent. As to column 11, lines 14-20, a step 164 determines whether a locally embedded URL is on the cache list for the client machine. Based on this decision, the URL is appended to the process page if present on the cache list; otherwise, a new HTML object is composed through the recursive process 76'. Accordingly, to the extent any local content at the client machine is being utilized, it is

from the cache memory.<sup>1</sup> Further, when the cache memory is utilized, there has been no associated modification of the requested page. Column 6 of Schleimer et al. also pertains to the use of the client machine's cache memory. The advantage of using the cache memory of the client is that "embedded images or other large files (such as video or audio files) need to be sent from the host machine to the client machine only once, since subsequent references within the same page can be retrieved from the client machine's cache memory." Col. 6, lines 27-31.

In contrast, claim 4 pertains to a method for modifying a web page to point to local content on a portable computer readable storage product instead of remote content. Among other things, claim 4 recites: "modifying the web page to direct retrieval of content for the image to be retrieved locally from the portable computer readable storage product instead of from the remote content." In other words, the method of claim 4 operates to modify a web page so that an image included within the web page can be retrieved locally from a portable computer readable storage product. Hence, the image need not be retrieved from remote content provided over a network. As noted in the present specification, "a portable computer readable storage" is, for example, a CD-ROM, floppy disk, data storage card, or any other portable or semi-portable computer readable medium. In other words, the portable computer readable storage recited in claim 4 does not correspond to a cache memory of a client machine. In view of the Examiner's comments, claim 4 has been amended to clarify that the portable computer readable storage product is exclusively portable.

Therefore, it is submitted that claim 4 is patentably distinct from Schleimer et al. In addition, it is submitted that claim 9, which recites limitations similar to those recited in claim 4 (although in computer readable medium format), is also patentably distinct from Schleimer et al.

Based on the foregoing, it is submitted that claims 4 and 9 are patentably distinct from Schleimer et al. In addition, it is submitted that dependent claims 10-15 are also patentably

---

<sup>1</sup> Here, it is noted that on page 4 of the Office Action the Examiner disagrees with this statement. The appears to point to Figs. 6a and 6b and col. 8, lines 23-60 of Schleimer et al. The embodiment of Figs. 6A and 6b of Schleimer et al. does not make use of a cache memory in its processing. The processing simply forms the processed page 98 by processing any embedded URLs to copy in such data into the processed page 98. As a result, the "Processed Page does not include local embedded URLs which would cause time consuming re-connections to the host machine." Schleimer et al., col. 8, 51-54. The embodiment of Fig. 9 of Schleimer et al. takes into consideration of the contents of a cache memory – in such embodiment there is no modification when local embedded URLs are in the cache memory. In contrast, the claimed invention is not making use of a cache memory and is modifying for the purpose of using (not avoiding) local client-side content.

distinct from Schleimer et al. for at least the same reasons. The additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from Schleimer et al. Thus, it is respectfully requested that the Examiner withdraw the rejection of claims 4 and 9-15 under 35 USC § 102(e).

#### **REJECTION OF CLAIMS 1-3 AND 5-8 UNDER 35 USC § 103(a)**

In the Office Action, the Examiner rejected claims 1-3 and 5-8 under 35 USC 103(a) has been unpatentable over Schleimer et al. in view of Mighdoll. This rejection is fully traversed below.

Claim 1 pertains to a method for modifying a web page to point to local content instead of remote content. Among other things, claim 1 recites: “modifying the web page to direct retrieval of content for the image to be retrieved locally from the portable computer readable storage products instead of from the remote content.” The use of portable computer readable storage products in this regard is believed to be novel. Additionally, claim 1 recites: “determining whether the image is supported by an image database that stores images associated with exclusively portable computer readable storage products distributed to users.” On page 9 of the Office Action, the Examiner states that Schleimer et al. fails to disclose this operation. Hence, as to this limitation, the Examiner relies on Mighdoll.

In Mighdoll, a server functions as a caching proxy on behalf of clients for purposes of accessing the World Wide Web. “The proxying server includes a persistent document database, which stores various attributes of all documents previously retrieved in response to a request from a client. When a Web document is retrieved from a remote server in response to a request from the client, the database is consulted and the stored information relating to the requested document is used by the server in transcoding that document. .... The document database is also used for prefetching previously requested documents and images and for reducing latency when downloading images through the client.”

Hence, at best, Mighdoll provides that a server can operate as a caching proxy on behalf of a client to reduce latency when downloading images associated with a document requested by a client. Any caching being provided is not at local machine, but at a server. The server based caching proxy is not a portable computer readable storage product as recited in claim 1. Hence, there is no teaching or suggest for in Mighdoll for

use of a portable computer readable storage product that is distributed to users for the purpose of providing local content. Therefore, it is submitted that claim 1 is patentably distinct from Schleimer et al. in combination with Mighdoll.

Claim 5 pertains to a method for modifying a web page to point to local content on a portable computer readable storage product instead of remote content. The processing includes “determining whether the high-bandwidth content is supported by a database that stores high-bandwidth content associated with exclusively portable computer readable storage products to be created; adding the high-bandwidth content to the database when said determining determines that the high-bandwidth content is not yet supported by the database” (claims 5, lines 6-11). Accordingly, it is submitted that claim 5 is also patentably distinct from Schleimer et al. in combination with Mighdoll.

Based on the foregoing, it is submitted that claims 1 and 5 are patentably distinct from Schleimer et al. in combination with Mighdoll. In addition, it is submitted that dependent claims 2, 3, 7 and 8 are also patentably distinct from Schleimer et al. in combination with Mighdoll, for at least the same reasons as their corresponding independent claim. The additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from Schleimer et al. Thus, it is respectfully requested that the Examiner withdraw the rejection of claims 1-3 and 5-8 under 35 USC § 103(a).

## SUMMARY

It is submitted that the claims are not objectionable. In addition, it is submitted that claims 1-15 (as well as new claims 16-18) are patentably distinct from the cited references. Reconsideration of the application and an early Notice of Allowance are earnestly solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 50-0388 (Order No. RCY1P005).

Respectfully submitted,

BEYER WEAVER & THOMAS, LLP



C. Douglass Thomas  
Reg. No. 32,947

P.O. Box 778  
Berkeley, CA 94704-0778  
650-961-8300